

Mr. Jeff Geisler
Jasper Rubber Products, Inc.
PO Box 706
Jasper, IN 47547-0706

Re: 037-11337
First Significant Revision to
FESOP 037-9390-00040

Dear Mr. Geisler.:

Jasper Rubber Products, Inc. was re-issued a permit on May 1, 1998 for operation of a stationary rubber and plastic seal, gasket and custom form manufacturing plant. A letter requesting changes to this permit was received on September 13, 1999. Pursuant to the provisions of 326 IAC 2-8-11.1 a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of removal of compliance monitoring requirements(D.2.5, D.2.6 and D.2.7) and record keeping and reporting requirements(D.2.8 and D.2.9) because the allowable emissions for each facility is below ten (10) pounds per hour. This modification also consists of addition of a natural gas-fired/No.2 distillate fuel-fired boiler, identified as EU8 and increasing the maximum capacity of the four(4) cutting, grinding, mandreling/vulcanizing operations, identified as EU4, EU5, EU6 and EU7 from 1,800 pounds per hour to 2,178 pounds per hour by adding two(2) more additional machines.

1. Pursuant to 326 IAC 12 and (40 CFR 60.40c, Subpart Dc) the boiler is subject to the following:

(a) When distillate fuel is used:

The boiler is subject to the New Source Performance standard, 326 IAC 12, (40 CFR 60.42c, Subpart Dc(Standard for sulfur dioxide):

- (i) On and after the date on which the initial performance test is completed or required to be completed under 326 IAC 12, (40 CFR 60.8(performance tests)), whichever date comes first, no owner or operator of an affected facility that combusts oil shall cause to be discharged into the atmosphere from that affected facility any gases that contain SO₂ in excess of 0.50 lb/MMBtu heat input;
- (ii) fuel oil sulfur limits may be determined based on a certification from the fuel supplier.

(b) When distillate fuel is used:

The boiler is subject to the New Source Performance standard, 326 IAC 12, (40 CFR

60.44c, Subpart Dc(Compliance and performance test methods and procedures for sulfur dioxide):

- (i) For oil fired affected facilities where the owner or operator seeks to demonstrate compliance with the fuel oil sulfur limits under part (b) based on shipment fuel sampling, the initial performance test shall consist of sampling and analyzing the oil in the initial tank of oil to be fired in the steam generating unit to demonstrate that the oil contains 0.5 weight percent sulfur or less;
- (ii) The owner or operator seeks to demonstrate compliance with the SO₂ standards based on fuel supplier certification, the performance test shall consist of the certification from the fuel supplier.

(c) When natural gas or distillate fuel is used:

The boiler is subject to the New Source Performance standard, 326 IAC 12, (40 CFR 60.48c, Subpart Dc(Reporting and recordkeeping requirements):

- (i) The owner or operator of each affected facility shall record and maintain records of the amounts of each fuel combusted during each day(distillate fuel) and each month(natural gas);
- (ii) All records required under this section (a) shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record.

2. Pursuant to 326 IAC 6-1-2, sources located in the counties listed in the rule with the potential to emit 100 tons or more of particulate matter per year or have actual PM emissions of 10 tons or more shall comply with the emission limitations of this rule. The following emission limitations shall apply:

- (a) Pursuant to 326 IAC 6-1-2(b)(4), particulate matter emissions from the boiler EU8 shall not exceed 0.15 pounds per MMBtu when operating with fuel oil.
- (b) Pursuant to 326 IAC 6-1-2(b)(5), particulate matter emissions from the boiler EU8 shall not exceed 0.01 grains per dry standard cubic feet when operating with natural gas.
- (c) Pursuant to 326 IAC 6-1-2(a), particulate matter emissions from the mandreling and vulcanizing operation EU3 and the three grinding operations EU4, EU5 and EU6, shall not exceed 0.03 grains per dry standard cubic feet. At their respective flow rates, this is equivalent to the pounds per hour listed in the following table:

Facility	Flow Rate (cfm)	326 IAC 6-1-2 limit	Pounds per Hour
EU3	11,000	0.03 gr/dscf	2.83
EU4	8,000	0.03 gr/dscf	2.06
EU5	24,000	0.03 gr/dscf	6.17
EU6	1,500	0.03 gr/dscf	0.39

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Management (OAM).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Shantanu Pahi, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Shantanu Pahi or extension 3-0868, or dial (317) 233-0868.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments: Amended FESOP Pages (9 Pages.)

Spahi

cc: File - Dubois County
U.S. EPA, Region V
Dubois County Health Department
Southwest Regional Office
Air Compliance Section Inspector - Gene Kelso
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Significant *Permit Revision* to a *Federally Enforceable State Operating Permit*

Source Background and Description

Source Name:	<i>Jasper Rubber Products, Inc.</i>
Source Location:	<i>1010 First Avenue, Jasper, Indiana 47546</i>
County:	<i>Dubois</i>
SIC Code:	<i>3069/3089</i>
Operation Permit No.:	<i>F 037-9390-00040</i>
Operation Permit Issuance Date:	<i>May 1, 1998</i>
<i>Permit Revision No.:</i>	<i>037-11337-00040</i>
Permit Reviewer:	<i>Spahi</i>

The Office of Air Management (OAM) has reviewed a revision application from Jasper Rubber Products, Inc. relating to the the construction and operation of the following emission units and pollution control devices:

- (a) One (1) natural gas-fired/No. 2 fuel oil-fired boiler, identified as EU8, with a maximum capacity of 14.67 MMBtu/hr heat input, and exhausting to stack 2108.

History

On September 13, 1999, Jasper Rubber Products, Inc. submitted an application to the OAM requesting to add a boiler and a glue booth to their existing plant and to remove inapplicable monitoring conditions from their permit. Jasper Rubber Products, Inc. was issued a FESOP permit (037-5532-00040) on December 10, 1996 and then was re-issued a FESOP permit (037-9390-00040) on May 1, 1998, when the source submitted an application for a minor permit revision and modification.

Source Definition

This stationary rubber and plastic seal, gasket and custom form manufacturing company consists of three(3) plants:

- (a) Plant 1 is located at 1010 First Avenue, Jasper, Indiana 47546;
- (b) Plant 2 is located at 1055 First Avenue, Jasper, Indiana 47546: and
- (c) Plant 3 is located at 1093 First Avenue, Jasper, Indiana 47546.

Since all three(3) plants are located in contiguous properties, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source.

Existing Approvals

The source was issued a FESOP Operating Permit F 037-5532-00040 on December 10, 1996. The source has since received the following:

- (a) Re-issued a new FESOP permit No.: 037-9390, issued on May 1, 1998.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
4200	Grinding	25	3	24,000	Ambient
2108	Boiler	30	1.5	3500	475

Recommendation

The staff recommends to the Commissioner that the Significant Permit Revision be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on September 13, 1998.

Emission Calculations

See Appendix A of this document for detailed emissions calculations from the boiler (1 Page.)

The calculations submitted by the applicant for the cutting, grinding mandreling and vulcanizing operations have been verified and found to be accurate and correct. The VOC calculations from the spray booth have been also verified and found to be correct. These calculations are provided in Appendix B of this document (3 Pages.)

Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	Potential To Emit (tons/year)
PM	395.31
PM-10	395.71
SO ₂	0.0
VOC	0.663
CO	5.4
NO _x	3.2

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

Justification for Revision

The FESOP permit is being modified through a FESOP Significant Permit Revision. This revision is being performed pursuant to 326 IAC 2-8-11(f)(1)(E) because the potential to emit (PTE) of particulate matter (PM) and particulate matter with an aerodynamic diameter less than or equal to ten (10) micrometers (PM-10) from the modification is greater than twenty-five(25) tons per year.

Additionally, compliance monitoring conditions for the mixing operation (EU7), cutting and grinding operations (EU4, EU5 and EU6) and mandreling/vulcanizing operation (EU3) are being removed from the permit because compliance monitoring conditions do not apply to facilities with controls which have allowable emissions less than ten (10) pounds per hour. The deletion of these monitoring conditions from the permit is also considered a significant permit revision.

County Attainment Status

The source is located in Dubois County.

Pollutant	Status
PM-10	Secondary
SO ₂	Attainment
NO ₂	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Dubois County has been designated as attainment or unclassifiable for ozone.
- (b) Dubois County has been classified as attainment or unclassifiable for PM and PM-10. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	99.00
PM-10	99.00
SO ₂	41.39
VOC	0.323
CO	2.95
NO _x	11.8

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.
- (b) These emissions are based upon the FESOP Permit 037-9390-00040.

Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO ₂	VOC	CO	NO _x	All HAPs
EU3	0.92	0.92	0.0	0.0	0.0	0.0	0.0
EU4 & EU5	6.35	6.35	0.0	0.0	0.0	0.0	0.0
EU6	0.70	0.70	0.0	0.0	0.0	0.0	0.0
Boiler(EU8)	0.1	0.5	0.0	0.4	5.4	3.2	0.0
Others(Glue Booth)	0.0	0.0	0.0	0.26	0.0	0.0	0.051*
							0.221**
Total	8.07	8.47	0.0	0.66	5.4	3.2	0.271
PSD Significant levels	25	15	40	40	100	40	-

* Ethyl Benzene ** Xylene

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Federal Rule Applicability

- (a) The boiler is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc:

(1) When distillate fuel is used:

The boiler is subject to the New Source Performance standard, 326 IAC 12, (40 CFR 60.42c, Subpart Dc(Standard for sulfur dioxide):

- (i) On and after the date on which the initial performance test is completed or required to be completed under 326 IAC 12, (40 CFR 60.8(performance tests)), whichever date comes first, no owner or operator of an affected facility that combusts oil shall cause to be discharged into the atmosphere from that affected facility any gases that contain SO₂ in excess of 0.50 lb/MMBtu heat input;
- (ii) fuel oil sulfur limits may be determined based on a certification from the fuel supplier.

(2) When distillate fuel is used:

The boiler is subject to the New Source Performance standard, 326 IAC 12, (40 CFR 60.44c, Subpart Dc(Compliance and performance test methods and procedures for sulfur dioxide):

- (i) For oil fired affected facilities where the owner or operator seeks to demonstrate compliance with the fuel oil sulfur limits under part (1) based on shipment fuel sampling, the initial performance test shall consist of sampling and analyzing the oil in the initial tank of oil to be fired in the steam generating unit to demonstrate that the oil contains 0.5 weight percent sulfur or less;
- (ii) The owner or operator seeks to demonstrate compliance with the SO₂ standards based on fuel supplier certification, the performance test shall consist of the certification from the fuel supplier.

(3) When natural gas or distillate fuel is used:

The boiler is subject to the New Source Performance standard, 326 IAC 12, (40 CFR 60.48c, Subpart Dc(Reporting and recordkeeping requirements):

- (i) The owner or operator of each affected facility shall record and maintain records of the amounts of each fuel combusted during each day(distillate fuel) and each month(natural gas);
- (ii) All records required under this section (a) shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record.

- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR part 63) applicable to this source.

State Rule Applicability - Individual Facilities

326 IAC 6-1-2 (Nonattainment Area Limitations)

Pursuant to 326 IAC 6-1-2, sources located in the counties listed in the rule with the potential to emit 100 tons or more of particulate matter per year or have actual PM emissions of 10 tons or more shall comply with the emission limitations of this rule. The following emission limitations shall apply:

- (a) Pursuant to 326 IAC 6-1-2(b)(4), particulate matter emissions from the boiler EU8 shall not exceed 0.15 pounds per MMBtu when operating with fuel oil.
- (b) Pursuant to 326 IAC 6-1-2(b)(5), particulate matter emissions from the boiler EU8 shall not exceed 0.01 grains per dry standard cubic feet when operating with natural gas.
- (c) Pursuant to 326 IAC 6-1-2(a), particulate matter emissions from the mandreling and vulcanizing operation EU3 and the three grinding operations EU4, EU5 and EU6, shall not exceed 0.03 grains per dry standard cubic feet. At their respective flow rates, this is equivalent to the pounds per hour listed in the following table:

Facility	Flow Rate (cfm)	326 IAC 6-1-2 limit	Pounds per Hour
EU3	11,000	0.03 gr/dscf	2.83
EU4	8,000	0.03 gr/dscf	2.06
EU5	24,000	0.03 gr/dscf	6.17
EU6	1,500	0.03 gr/dscf	0.39

Conclusion

The operation of the boiler and the grinding, mandreling and vulcanizing machines shall be subject to the conditions of the attached proposed Significant Permit Revision No. 037-11337-00040.